UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS WACO DIVISON

JENNILYN SALINAS, LINDSEY	§	
NGUYEN, DEANNA LORRAINE, et	§	
al.	§	
	§	
Plaintiffs.	§	
	§	
v.	§	CIVIL ACTION NO. 6:21-CV-162
	§	
NANCY PELOSI, MITCH	§	
McCONNELL, CHUCK SCHUMER,	§	
MARK ZUCKERBERG, et al.	§	
	§	
Defendants.	§	JURY TRIAL REQUESTED

AGREED MOTION FOR EXTENSION OF TIME TO RESPOND TO MOTION TO DISMISS [relates to Document No. 88)

COME NOW, Jennilyn Salinas, Lindsey Nguyen, "P.P.," "D.D.," "T.M.," "S.M.," and "M.L." (collectively, "Plaintiffs"), by and through their attorney, Paul M. Davis, to bring this Agreed Motion for Extension of Time to Respond to Motion to Dismiss of Defendants Ohio Governor Mike DeWine and Ohio Secretary of State Frank LaRose (the "Ohio Defendants"), and respectfully represent the following:

A. BACKGROUND

- 1. The Ohio Defendants filed their Motion to Dismiss on May 21, 2021.
- 2. Plaintiffs have a voluminous amount of evidence to establish personal jurisdiction and need extra time to organize the evidence for ease of presentation to the Court. Additionally, Plaintiffs need time to amend the complaint in response to issues raised by the Ohio Defendants.

3. Accordingly, on May 25, 2021, the Ohio Defendants agreed to extend Plaintiffs' time to respond to the Motion to Dismiss by 7 days to June 11, 2021.

WHEREFORE, Plaintiffs pray the Court extend Plaintiffs' deadline to respond to the Motion to Dismiss to June 11, 2021.

Respectfully submitted this June 1, 2021.

/s/ Paul M. Davis

Paul M. Davis
Texas Bar Number 24078401
paul@fireduptxlawyer.com
PAUL M. DAVIS & ASSOCIATES, P.C.
5720 Frisco Square Blvd., Apt. 2066
Frisco, TX 75034
Phone: 469-850-2930

ATTORNEY FOR PLAINTIFFS

CERTIFICATE OF CONFERENCE

I conferenced with counsel for the Ohio Defendants Gov. Mike DeWine and Sec. Frank LaRose by phone and by email on May 25, 2021 and counsel for the Ohio Defendants agreed to extend Plaintiffs deadline to respond to their Motion to Dismiss by 7 days to June 11, 2021.

/s/ Paul M. Davis
Paul M. Davis

CERTIFICATE OF SERVICE

I certify that I have served the foregoing motion on all counsel of record who have made appearances in this action to date via the court's ECF notification system on June 1, 2021.

/s/ Paul M. Davis
Paul M. Davis